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ABSTRACT

Fundamental features of the financial aid systems for college students in 10 European countries are described, as are the theoretical framework and research topics of the study on which this report is based. The study is intended to determine the per capita degree of subsidization in each country; to describe the effects of the financial aid program on socioeconomic recruitment to higher education; and to examine the decision-making process, particularly with regard to the consensus or conflict in the process and the knowledge of the effects of the program. The following chapters are prevented: (1) "Study Assistance--A Welfare Measure with Great Variation" (background of the study and the social and economic background of student aid in Europe); (2) "Descriptions of the Systems in the Different Countries" (Austria, England and Wales, West Germany, Finland, France, East Germany, Hungary, Ireland, Poland, and Sweden); (3) "Problems and Delimitation in a Comparative Analysis"; and (4) "Conceptual Framework" (the theories and sociopolitical context of the study). Contains 40 references. (KM)

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STUDY ASSISTANCE IN TEN EUROPEAN COUNTRIES: Overview and Conceptual Framework

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PREFACE

The report presented here has been prepared as part of the research project 'Study Assistance Policy in Ten European Countries - content, decision processes, and effects' at the Department of Political Science, Umeå University. The project, which is financed by the Bank of Sweden Tercentenary Foundation, commenced in 1985 and is expected to continue for three years. In this report we want both to describe the fundamental features of the 10 countries' systems of financial assistance for students in higher education and to present the study's theoretical framework and the research topics we have selected.

Cost and time limitations have confined the study to 10 European countries. However, there is nothing to prevent from being expanded. On the contrary, it would appear possible to achieve a more reliable and fruitful result if more countries are included. The international research project planned by the National Association of Student Financial Aid (NASFAA) means that the study's base can be broadened without altering the basic principles.

One starting point for the study is that study assistance is a component of higher education policy. The aim of study assistance is thus to contribute to the achievement of the education policy goals.

Another point of departure is that the responsibility, for the costs of education, is, in principle, shared by society and the individual. Society, through the State, is responsible for the organization of education, courses, the teachers salaries etc., whilst the individual pays for his/her own up keep.

The fact that society, through the State, provides financial assistance for the maintenance of the individual is considered to be an expression of society's need for highly qualified man power. This constitutes a third starting point. It must be added that study assistance can also be, and frequently is, used to attain other goals than the purely educational e.g. equality

goals, social and family policy goals.

A forth point of departure is that the relative constancy and stability of study assistance over time is related to whether the decision making concerning the study assistance programmes is characterized by conflict or consensus and/or whether the decisions are based on insights into and knowledge of the effects of study assistance. The four starting points constitute the study's frame of reference, namely:

- to describe the study assistance programmes in 10 European countries;
- to establish the per capita degree of subsidization, particularly with regard to its relationship to the student's maintenance costs;
- to describe the effects of the study assistance programmes in terms of socio-economic recruitment to higher education;
- to examine the extent to which consensus or conflict has ruled in the decision making surrounding study assistance as well as whether the decision making has been characterized by knowledge of and insights into the effects of the study assistance programme.

The first part of the report (sections 1 and 2) contains an introduction and a description of the 10 countries' study assistance programmes. Section 3 presents a compilation of the most important of the variables used in order to attain the goals inherent in the study assistance programmes. The final and concluding section (4) comprises both the theoretical framework for the project and an exposition of the research topics.

Umeå May 1987

The authors

STUDY ASSISTANCE IN TEN EUROPEAN COUNTRIES - Overview and Conceptual Framework

1. Study Assistance - A Welfare Measure with Great Variation

The study assistance systems currently in force in Europe have, in the main, been set up during the 1960s and beginning of the 1970s. Thus they are about 20 years old and can now be counted as a permanent feature of the welfare states' battery of measures. Study assistance in, for example, the form of scholarships has probably always existed. However, it was only with the educational explosion in the 1960s that such assistance became part of public expenditure in the same way as other welfare measures.

In most cases there has been political agreement over the introduction of study assistance as a general welfare measure. However, opinions have been more divided with regard to its design. Nevertheless, this has not had any lasting effects on the fundamental features of the design. The distinguishing characteristic of this social measure is the relative stability of the essential design. It is only now during the most recent period that principle changes are beginning to be introduced or considered. Sweden provides a telling example in this respect.

A comparison of the designs of the current European systems reveals considerable variation in many respects. From entirely loan based systems to entirely grant based systems and those with differing combinations of these two. From systems with essentially indirect assistance to systems with entirely monetary support. From systems where very reasonable demands are set for exam result (grades attained) to systems where exam results are rewarded according to special scales. From systems where study assistance is not means tested against parental income and is generally the same for everyone to extremely far reaching means testing and great differentiation. In addition to the study

assistance dimensions mentioned here, there are also considerable variations with regard to more technical details such as the means of repaying study loans, the length of time allowed for repayment, the method used for means testing, and the procedures followed when study assistance is granted. In short, study assistance, in different countries, provides a very richly varied picture of a state welfare measure which can also be presumed to give expression to a country's attitude towards the costs of financing education, equality, the position of the family and so forth.

Even if study assistance is a fairly well delimited policy area where the measures apply to a clearly defined category, it is, nevertheless, a complicated matter composed of a number of components. Together these components build a programme, a study assistance programme. The term study assistance programme is used here to summarize the goals and fundamental principles of the study assistance measures and the regulations and organisation for their implementation.

A project is currently under way at the Department of Political Science, Umeå University in which a number of aspects of the study assistance programmes in 10 European Countries are being compared. The choice of countries has been made according to the principle of obtaining as much variation as possible in the most important variables. Thus the 10 countries represent, amongst other things, different forms of assistance from entirely loan based systems to those with only grants; different degrees of means testing and different requirements regarding exam results (grades obtained). The aim is further to encompass countries with differing political systems. We have therefore, also included three socialist countries in order to obtain a better understanding of the intentions underlying study assistance. The following countries are part of the study: Austria, England, Federal Republic of Germany (FRG), Finland, France, German Democratic Republic (GDR), Hungary, Ireland, Poland, and Sweden.

The following overview of the study assistance programmes in the ten countries only deals with the assistance given directly to the individual. In most countries there is also a more or less

comprehensive system of indirect assistance such as subsidized student accomodation, meals, travel etc. However, we refrain from discussing this indirect assistance. Nevertheless this is of importance in a number of countries e.g. France and East Germany.

In the description of each country, we have tried to make clear the method by which the study assistance is calculated thus, hopefully, revealing the principles involved and enabling them to be understood.

2. Descriptions of the Systems in the Different Countries

2.1 AUSTRIA

Since 1963 Austrian citizens studying at university, institutes of further education and art colleges have had a legal right to a grant for studying. In Austria, the study grant is a pecuniary aid to students in need of study assistance. The study grant is only considered to be a complement to the general family assistance.

The following are counted as the general assistance:

- family allowance (child allowance)
- travel assistance
- subsidized meals and student accomodation
- social and accident insurance
- child allowance for public employees

The family allowance (child allowance), which in 1982 was 1,100 schilling/month, is paid until the child is 28 and has not yet completed his/her education. Study assistance is regarded as subsidiary and complementary to the family's maintenance of the student. 12 per cent of all students at university and institutes of further education had study assistance, irrespective of amount, for the academic year 1981/82. The absolute figure was 13,775 students.

The prerequisites for receiving study assistance are, in principle, the following:

- that the student is judged to be in need of financial assistance,
- that the student can produce the required exam/grades,
- that the studies have been commenced within 10 years of obtaining the school certificate necessary for entrance to university (Hochschulreife) and before the age of 36,
- that the student has not already completed a degree or other higher education qualification,
- that the student is not working more than half-time.

The right to study assistance is forfeited if the student:

- changes course more than once
- exceeds the set length of time for the course (normal study time) by more than one term without special reasons.

The Austrian study assistance system contains, like the West German system, a reward for achievements element in the form of a special scholarship (Begabtenstipendium). Those who belong to the best 10 per cent in terms of exam results at each university, college or institution receive an extra 5,000 schilling per ye in addition to their possible grant.

Assessment of the Need for Study Assistance

In the assessment of the student's need for study assistance account is taken of his/her income and assets and the maintenance which the parents, according to the law, are expected to provide.

When the student's income is calculated, a sum of, at most, 33,000
schilling is disregarded. This sum arises from:

- income from holiday work
- temporary employment at the university or college
- scholarships
- income from, at most, half-time employment as an assistant

If the sum of these incomes exceeds 33,000 schilling, the excess amount is not included in the discounted income.

The Size of the Study Assistance

The study assistance is calculated in the following way: basic sum + possible supplements - (the student's own income + the parents' maintenance or maintenance from husband/wife + possible scholarships).

The grant's basic amount is 25,000 schilling per year for

unmarried students and 30,000 for married students and unmarried students responsible for the care of underaged children. This basic sum is increased by 13,000 schilling if:

- the student's biological parents are dead or
- the student has been able to wholely support him/herself for four years prior to commencing studying or
- the student's place of residence lies so far from the place of study that daily travel is not possible or
- the student is not part of either of his/her biological parents' or spouce's parents' households

The above named basic sum is increased by 16,500 schilling if the student is handicapped as defined in the family equality law (Familienausgleichgesetz).

The basic sum, with possible supplements, is reduced by:

- the amount by which the student's income, minus the discounted income, exceeds 13,000 schilling per year. This only applies to income earned through, at most, half-time employment
- the set maintenance sum which the parents have to pay unless the student has been wholly self-supporting before beginning his/her studies
- the set maintenance sum which the husband/wife of a married student is expected to pay.

The parental maintenance contribution is a certain percentage of the basic sum (Bemessungsgrundlage). The basic sum is the parental or spouce's income reduced by:

- 21,000 schilling for each person for whom the student, one or other of his/her parents or the husband/wife is responsible for supporting
- 9,000 schilling for each person who is studying at one of the institutes of further education named in the study assistance law or at some other educational establishment
- 16,500 schilling if the student is handicapped.

These allowances are reduced if the person, for whom the

deduction can be made, has an income. A deduction of 15,000 schilling is allowed for the student him/herself if he/she is 27 or over.

The percentages for calculating the parental maintenance contribution are as follows:

Annual Income	Per Cent of the Basic Sum
Up to 44,000 schilling	0
44,001 - 88,000 "	20
88,001 - 115,500 "	25
115,501 - 142,000 "	35
more than 142,000 "	45

30 per cent of the amount by which the husband/wife's income exceeds 40,000 schilling per year is regarded as maintenance.

A general supplement of 10 per cent is added to the calculated study grant.

If the student receives a scholarship or study grant other than from the state, the amount of grant is reduced so that the total sum does not exceed the largest possible state study grant by more than 8,000 schilling. The study grant is not paid if the calculated sum is less than 2,000 schilling/year.

Those whose parents or husband/wife have/has either assets of more than 500,000 schilling or more than 300,000 schilling and, at the same time, the study grant does not amount to half of the maximum sum, are not entitled to claim a study grant.

The following fictitious example can serve as a simplified model of how the study grant is calculated. The example applies to a student who is the only child in the family and lives away from home.

Basic grant:	25,000			
Supplement for living away from home	+ 13,000			38,000 sch
The student's income:	25,000			
Discounted income	- 33,000			0
				38,000
Maintenance from parents:				
Income	140,000			
Less maintenance for the student	- 21,000	119,000		
Less 9,000 if the student is studying at an institute of further education specified in the Study Assistance Act		- 9,000	110,000	
Parental maintenance contribution				
25% of 110,000 = 27,500				- 27,500
				10,500 sch
10% supplement				1,050
				11,550 sch

The study grant is, in this case 11,550 schilling.

The distribution of students with and without study grants within the socio-economic structure is illustrated by the below table. The figures in the table are based on two separate studies which is clear from the differences in the socio-economic groupings.

Table: Socio-Economic Structure Amongst Students at University.

Students / Father's occupation	Total at university		Students with study grants	
	1971/72	1979/80	1975/76	1980*
Self-Employed	24	25	15	18
Farmers	5	6	18	17
Lower status salaried employees	29	30	15	12
Middle status salaried employees				19
Higher status salaried employees	29	22	23	12
Manual workers	12	15	23	22
Other (including unemployed)	1	2	6	
Sum per cent:	100	100	100	100

N.B. In the 1980 study a different socio-economic classification was used than previously, namely "Materialen zur sozialen Lage der Studierenden II". Bundesministerium für Wissenschaft und Forschung 1982. In this the categories lower and higher status salaried employees are divided into three, see the above table.
The figures for the academic years 1971/72, 1975/76, and 1979/80 are taken from Bodenhöfer, Ötsch, Terlaak: Finanzierung der Hochschulexpansion, Orac-Verlag Wien 1980.

In information for foreign students studying in Austria (published by Österreichische Auslandsstudentendienst ÖAD 1985) the costs for maintenance are given as 5,500 schilling/month for single students. The sum, which is for 1984, is said to be an average cost and the absolute minimum necessary for a student to live on.

2.2 ENGLAND AND WALES

The English study assistance system dates from 1962. There have been a few minor changes since then but none of any great significance. The fundamental principle of the system was laid down by the Anderson Committee in 1960 which decided that all British citizens who had two "A" levels (i.e. advanced certificate) should be entitled to a grant from public funds. The principle has, however, been furnished with a restriction namely that all grants are means tested against the parents' and/or the student's income. (We shall discuss the system in more detail below.)

A study assistance system which has been in force for over 20 years has naturally been critized from all sides. Suggestions to change from grants to loans, to introduce a special educational tax, to abolish means testing are some of the most important proposals. However, these have not led to changes other than alterations in the means testing scales. Today the grant system is again on the political agenda. There has been discussions about introducing some form of loan system or a mixture between loans and grants, but for the academic year 1986/87 there will be no changes in the grant system.

The Present Study Assistance System

There are two kinds of grant for further studies. The grants for degree studies at university, polytechnic or college are called "mandatory awards" whereas the grants for other courses in the rest of the further education system are called "discretionary awards." The rules governing these discretionary grants are not the same throughout the country but vary between the different local government study assistance authorities, the Local Education Authorities (LEA). Only the mandatory awards will be dealt with within in this report.

In order to be able to apply for a grant from the English state, the student must be accepted for a recognized course within the further education system. The final decision to award the student a grant is taken by the LEA. In order to be considered the

student must have lived in Great Britain for the last three years. However, the rules state that if residence abroad has been of a temporary nature e.g. the parents have been working abroad, the student can still be counted as living in England.

A normal grant is designed to cover living and study costs for the student (maintenance grant) and tuition fees at the appropriate educational establishment. The fees charged by the different educational institutions vary according to the institution's status. The fees which are not means tested are paid directly to the institution by the LEA if the student has obtained a place there.

The grant for living and study costs is paid out for term time which includes the Christmas and Easter vacations but not the summer vacation. A student who can not support him/herself during the summer vacation can apply to the LEA for additional study assistance to cover the summer recess. However, this extra money is relatively difficult to obtain and most students who have trouble supporting themselves are referred to the normal social welfare services.

The study costs, according to the present rules, should be completely covered by a maintenance grant, which is means tested against the student's and his/her parents' financial resources. British students are regarded as being dependent on their parents until they are 25 years old. This applies even to married students, although there are certain special regulations in their case. If the married student has been responsible for his/her own up keep for a period of three years, he/she is considered to be independent of his/her parents. The number of students who are dependent on their parents naturally varies somewhat over time subject to how often the income scales used in the means testing are revised. A normal figure lies between 85 per cent and 90 per cent of all students.

The idea behind the means tested grant is that the parents should be financially able to provide their son or daughter with the difference between the full grant and that which the student receives after means testing. However, the parents are not

legally bound to contribute their share, nor is there any legal requirement for them to state their income when the grant is being assessed. If the parents do not give any details of their income, the student, as and from the academic year 1985/86, does not obtain a grant from the state. The ideas underlying the study assistance system are illustrated in the following figure:

Figure: The Relationship Between the Parental Contribution and the Maintenance Grant.

Total grant	=	Means tested grant from the state	+	Parental contribution according to a scale laid down by the state

The maintenance grant is intended to provide the student with sufficient resources to be able to live reasonably during term time. The scale which is applicable for means testing against the parents' income for the academic year 1985/86 is presented in the table below. The table applies to the parents' income after various deductions for interest charges, pension insurance, and a certain allowance for each person who is dependent on the household's income e.g. school children.

Table: The Relationship Between the Parental Income and Expected Contribution to Children Who are Studying. Maximum Level of Contribution in Each Family.

Net income after allowances	1985-86 parental contribution	Net income after allowances	1985-86 parental contribution
7,600	-	12,000	674
7,800	-	13,000	874
8,000	-	14,000	1,074
8,100	20	15,000	1,274
8,200	34	15,500	1,399
8,400	62	16,000	1,524
8,600	91	17,000	1,774
8,800	120	28,000	2,024
9,000	148	19,000	2,274
10,000	291	20,000	2,524
10,100	305	21,000	2,774
10,200	320	22,000	3,024
10,300	334	23,000	3,274
10,400	354	24,000	3,524
10,500	374	25,000	3,774
11,000	474		

Source: Grants to students - a brief guide 1985/86. Department of Education and Science (DES).

This table gives the maximum amount the parents should contribute regardless of the number of children studying. The parents can draw off a certain sum per child from this amount. The sum varies according to whether or not the children in question are also in receipt of a grant. In the case of children receiving a grant the parents are allowed to deduct a larger sum than for children not receiving a grant. In 1985/86 these allowances were 240 and 85 respectively.

In 1986/87 the DES is estimating the total parental contribution to 37.4 per cent of society's costs for study assistance. If those parents with low incomes who were exempted from the parental contribution and those whose children did not receive a grant are excluded from the calculation, the costs for the students' up keep were apportioned 2:1 between the state and the parents. However, it is a recognized fact that many parents do not contribute their expected share. A survey in 1973 showed that 73 per cent of all students who were entitled to assistance from their parents received a smaller amount than the intended. The changes in the scales for means testing the parental contribution for the academic year 1985/86 affected a majority of the students. 70 per cent of all students are today assessed for a parental contribution (Source: DES Statistical Bulletin 3/85 January 1985, table 4).

If the parents contribute the difference between the amount their children actually receive in grant and the full maintenance grant, it is possible for them to claim the contribution against tax when they fill in their income tax returns the following year. However, half of the parents who contribute to their children's grant do not take advantage of this opportunity. The National Union of Students in United Kingdom (NUS) has undertaken a comprehensive campaign, including the production of special forms, to enlighten parents as to this possibility, although the results have been relatively poor. The reason why NUS has shown such interest in this question is that a considerable number of parents do not give their children the difference between the full grant and the means tested grant provided by the state. A probable explanation as to why parents do not take advantage of the possibility of making a tax claim is that, if they do so, the

child must count it as income and it can also mean that the student must pay tax depending on his/her remaining income.

The covenant system is designed so that student may take advantage of their personal tax allowance (currently £2,335) and may receive so much via a convenant as equal to the parental contribution. Over that level it can affect the grant, but is subject to a disregard of £460. If the student does not have sufficient of their personal tax allowance left then they will only be able to benefit up until the level of their personal allowance.

The size of the full maintenance grant varies somewhat depending on where the student lives. The appropriate amounts for the academic year 1985/86 are summarized below:

- £1,830 students living outside the London area and living in some form of student accomodation

- £2,165 for students living in student accomodation in the London area

- £780 for students who have free board and lodging provided by the educational institution

- £1,480 for students living in the parental home. The various LEAs issue this form of grant to all students who are able to live at home. In this way the state's costs for grants can be kept down

The English study assistance system also contains a number of supplements specially adjusted to meet the needs of groups of students who do not fit the rules which are designed to suit the normal student. Included amongst these special grants are the following: additional assistance for students with children, handicapped students, and mature students. Furthermore it should be mentioned that there is a special travel allowance, designed so that students who decide to live at home instead of moving closer to the university can obtain up to £165 and those who decide to live away from home can obtain a maximum of £105 per

year.

It is possible, particularly in the case of very able students, to obtain additional grants. For example a company can award a scholarship of up to £1,280 per year to a student without adversely affecting his/her state maintenance grant. There are also various types of special scholarship, above all, for different technical degrees and teachers training qualifications in shortage subjects.

The aim of the English study assistance system is to remove economic obstacles which hinder young people from entering further education. A full grant has been considered, by the state, to be sufficient for a student to live on but in evidence to the House of Commons Select Committee on Education, Science and Arts the Department of Education and Science admitted that the grant was no longer sufficient to meet the maintenance need of students (House of Commons, 2 December 1986).

Thus, one effect of the system should have been that the student population's social composition corresponds to the social composition of the relevant age groups of the population as a whole. However, studies of the students' social background show that this is clearly not the case. Only 7 per cent of the students have working class background.

2.3 FEDERAL REPUBLIC OF GERMANY (FRG) WEST GERMANY

The West German study assistance system was, prior to 1984, a mixed system which included two forms of assistance: grant and loan. The German Parliament (Bundestag) passed a Government Bill to abolish the grant and retain the study loan which is interest free. The new study assistance system came into force with effect from the autumn term 1983.

The West German study assistance for students in further education consists of a means tested study loan. The study assistance is means tested against the parents' income, husband/wife's income and also against the applicant's own income. The study assistance law assumes, as is laid down in the legislation covering family rights, that the parents are legally obliged, within the framework of their financial resources, to support their children until they have acquired the sought after and appropriate education. Children come of age at 18 but this does not invalidate the parents' duty to maintain them.

The study assistance regulations imply that the student has the right to study assistance for a degree/training, which corresponds with his/her wishes and abilities and under the presumption that the student lacks the means to meet living and study costs. If, as a consequence of the regulations the student is not eligible to receive study assistance, then the parents' maintenance duty applies. If the parents refuse to assume their responsibility, the student is compensated through the payment of assistance in advance. The claim for maintenance is then passed from the parents to the federal state which in turn can demand the costs for up keep from the parents.

The parents', the husband/wife's, and the student's income, after deductions for tax and social insurance, form the basis for means testing.

There is no means testing if the student has been gainfully employed for five years after the age of 18 or has, under a total of six years before the commencement of the studies, learnt and practiced a trade.

The following amounts of income are discounted in connection with the means testing (1986-87). If the student is dependent on his/her parents the following sums can be deducted:

for the parents	1,570 DM
for single parent	1,075 DM
for the applicant him/herself	85 DM
for every other child who is entitled to study assistance	85 DM
for other children and dependents	
- under 15 year	370 DM
- over 15 year	485 DM

After the deduction of these allowances, the parents can draw a further 25 percent from their income for themselves and 10 per cent for each child for which an allowance can be deducted, although at most:

60 DM for one child
140 DM for the second child
210 DM for the third and subsequent children

If the student is 27 or over at commencement of study the discounted income is increased by 50 per cent.

If the student has his/her own income
the discounted income allowance is 265 DM/month

If the student is married the following deductions can be made from his/her income:

husband/wife	460 DM/month
each child	370 DM/month

In the case of a married student with at least one child under 10 the husband/wife allowance deductable is increased to 675 DM.

The student's own income, minus discounted income and allowances, is added together with the parents' or the husband/wife's income. If the parents or spouse have/has taxable assets study assistance

is generally out of the question.

According to the rules laid down by the government, study assistance is only payable for the length of time of the chosen course at the institute of further education. The study assistance's maximum length of time can be extended if the student has had special reasons, acted as a student representative in different bodies, or failed at the first attempt at the final examinations.

The age limit for study assistance is 30 if the student has not already started studying before his 30th birthday. However, this limit does not apply to those who pursue certain night school courses, are studying for highly skilled qualifications, or because of family reasons, particularly care of children.

Study assistance amounts to 515 DM for students at higher vocational training schools, academies and institutes of further education. There is a supplement of 60 DM for those who live at home and of 195 DM for those who live away from home. This sum is increased by 38 DM per month for those who pay health insurance. If the rent for normal student accomodation exceeds 195 DM/month, there is an additional supplement of 75 per cent of the excess rent up to a maximum of 75 DM.

A numerical example can help to clarify the regulations. The case applies to a student of 25 who lives in a student room away from home and has a brother/sister who is under 15 living at home.

Basic loan			515 DM
Supplement for accomodation away from home			195 DM
			710 DM
Health Insurance			38 DM
			748 DM
Own Income	0 DM		
Parental income:			
Father	2,195 DM		
Mother	500 DM		
	2,695 DM	2,695 DM	
Discounted income:			
Parents'	1,570 DM		
Student him/herself	85 DM		
Brother/sister living at home	370 DM		
	2,025 DM	2,025 DM	
		670 DM	
Additional discounted income: 45% (25% 168 DM for the parents + 20% for the student him/herself 60 DM and 1 brother/sister 67 DM)		295 DM	
The discounted income		375 DM	375 DM
Study loan			373 DM/month

Loan Conditions

Following the completion of the degree/training the government authorities stipulate the size of the study debt. The borrower can appeal against this decision. The borrower is also given notice of the set length of time for the degree/training.

The loan carries no interest charges and repayment begins 5 years after termination of assistance. The repayment period is 20 years. The borrower's income forms the basis for calculating the size of the repayment charge. If this income is, at most, 1,075 DM/month then the regulations requiring the student to repay the loan are annulled. If the borrower is married, the amount discounted from his/her income base is increased by 485 DM/month for the husband/wife, by 370 DM for every child under 15, and by 485 for every child over 15. The income base can be lowered

depending on the husband/wife's or child's income.

The 20 year repayment period can be deferred by, at most, 10 years through the annullment of the obligation to repay. The repayment is at least 120 DM/month or treble this amount per quarter.

Remission of Part of the Study Debt

The study debt is reduced by 25 per cent for those who are amongst the top 30 per cent of students (with study loans) in the final examinations for that calendar year. The decision on placing is taken by the authority which ratifies the examination results for a particular degree at an institute of further education. As a basis for the comparison one or more comparison groups are created. It is the exam grade which determines the order of precedence.

Another possibility to reduce the study debt is offered to those who take the final examinations four months before the end of the set study time. The amount remitted is 5,000 DM.

The repayment is also remitted for each month during which the borrower's income falls below the base for the repayment charge and he/she is unable to work on a full-time or part time basis because he/she is taking care of a child/children under 10.

Early Repayment

The study debt is reduced by varying amounts if the borrower repays at a faster rate than that laid down. Such extra payments, in order to pay off the loan, must be at least 4,000 DM. A person who wants to repay 10,000 DM of the loan prematurely only needs to pay 7,400 DM, which corresponds to a 26 per cent reduction.

Table: The Study Assistance's Extensiveness. Proportion of Students at University Respective Institutes for Specialized Studies (Technical Colleges) Who have had Study Assistance at All Regardless of Amount. Per Cent.

	Universities	Institute for specialized studies (Technical colleges)	All institutes of further education
1973	39.2	63.0	not available
1976	38.2	63.0	" "
1979	33.0	60.0	" "
1982	33.7	53.5	37.1
1985	24.0	38.4	27.0

Source: Bundesminister für Bildung und Wissenschaft: Das soziale Bild der Studentenschaft in der Bundesrepublik. 11. Sozialerhebung des deutschen Studentenwerks. Studien zu Bildung und Wissenschaft 42, Bonn 1986. Table 7:1, pp. 258 and 259.

These percentages are calculated using the total number of students. If those who are ineligible for study loan are excluded then the figures are higher.

Table: The Extent of Study Assistance for the Spring Term 1982 and 1985. Those who are Ineligible for Study Assistance are Excluded from the Calculations. Per Cent.

	Year 1982	Year 1985
Universities	40.7	28.9
Women	39.5	27.4
Men	41.6	29.9
Institutes for specialized studies (Technical colleges)	59.4	44.3
Women	57.3	40.1
Men	60.4	46.0
Total	44.2	32.4
Women	42.0	29.5
Men	45.7	34.2

Source: Bundesminister für Bildung und Wissenschaft: Das soziale Bild der Studentenschaft in der Bundesrepublik. 11. Sozialerhebung des deutschen Studentenwerks. Studien zu Bildung und Wissenschaft 42, Bonn 1986. Table 7:1, p. 258.

The distribution of students with and without study assistance between different socio-economic groups is shown in the table below. The effects of the 1983 reform are clearly evident.

Table: Students at University by Father's Occupation. Per Cent.

Father's occupation	Proportion of students at university		Recipients of study assistance		Proportion of all those in the group with study assistance		All students	
	1982	1985	1982	1985	1982	1985	1982	1985
Manual worker	29	32	61	49	16	16		
Lower salaried employee	33	32	29	19	38	39		
Higher salaried employee	18	16	25	15	24	25		
Self Employed	20	20	30	23	22	20		
Sum	100.0	100.0			100.0	100.0		
Total			34	24				

Source: Bundesminister für Bildung und Wissenschaft: Das soziale Bild der Studentenschaft in der Bundesrepublik. 11. Sozialerhebung des deutschen Studentenwerks. Studien zu Bildung und Wissenschaft 42, Bonn 1986. Table 3:18, p. 101 and table 7:6, p. 267.

According to the German Civil Case Law 12th September 1950 (BgBl 1, Seite 455), changed 8th March 1984 (BgBl 1, Seite 364), the lower income limit at which seizure of private assets can occur is 754 DM for a single person without any kind of allowance. This limit obviously represents some sort of existence minimum.

The cost of living allowance for a student living away from home was 690 DM per month in 1985.[1)]

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1) Sechster Bericht nach § 35 des Bundesausbildungsförderungsgesetzes zur Überprüfung der Bedarfsätze, Freibeträge sowie Vomhundertzätze der Höchstbeträge nach §21. Abs. 2. Deutscher Bundestag, 10. Wahlperiode. Drucksache 10/4617, 02.01.86, Sachgebiet 2171: Übersicht 19, Seite 24.

2.4 FINLAND

The Finnish study assistance system has the task of furthering the student's means of subsistence. The assistance is in two forms: study grant and loan. The study grant is financed by the state whereas the study loan is provided by commercial banks, saving banks, or the Post Office Bank. However, the state stands surety for these loans and provides interest charges relief which reduces the interest costs for the student.

In summary, the study assistance contains the following components:

Study Grant		+	Study Loan	=	Study Assistance
Basic Sum	Accomodation Supplement				

The conditions on which study assistance is granted are that the student has social and economic needs related to studying and that the time taken to complete the studies does not exceed the normal length of time set for the degree/training.

Poor exam grades, as a result of illness or similar mitigating circumstances, are not an obstacle to the granting of study assistance. The time taken to complete the degree/training can, on similar grounds, be extended by a maximum of two years.

Means Testing

Means testing against the parents' income only occurs if the student has not filled 24 years of age before the start of the academic year (1st July). If the applicant is under 24, the parents' income and assets affect the study grant in the following way:

Student without dependents	Under 18 yrs 1st July	Under 19 yrs 1st July	Under 20 yrs 1st July	20-23 yrs 1st July
Living in the parental home	Affects all types of study assistance			
Living away from home	Affects all types of study assistance	Affects the study grant's basic sum and the accomodation supplement	Affects the study grant's basic sum	No effect

The parents' income and assets have no effect on the amount of study assistance awarded if the student is over 24.

With regard to the discounted income, i.e. the proportion of the income which is disregarded when the grant is calculated, the following limits apply:

Parental Income

Full Study Grant

Taxable Income	Taxable Assets
107,000 Finnish marks	290,000 Finnish marks
This amount is raised by 17,000 Finnish marks for every underaged brother or sister living at home and each adult brother or sister who is studying	

Reduced Sum

The study grant is reduced by 5% for every time the discounted income limit is exceeded by a sum of 2,400 Finnish marks	50% of the amount by which the assets exceed the discounted income's limits is ranked together with the parents' taxable income and the study grant is reduced accordingly

The following discounted income limits are applicable in the case of the study loan:

Full Loan

Taxable Income	Taxable Assets
166,000 Finnish marks	290,000 Finnish marks
This sum is increased by 17,000 Finnish marks for every underaged brother/ sister living at home and every adult brother/sister who is studying	

Reduced Loan

The study loan is reduced by 10% for every time the discounted income's limit is exceeded by a sum of 2,400 Finnish marks	50% of the amount by which the assets exceed the discounted income's limit is ranked together with the applicant's gross income and the study assistance is reduced accordingly

Student Without Dependents

Fully Study Assistance (Study Grant and Study Loan)

Gross income	Taxable Assets
16,000 Finnish marks*	100,000 Finnish marks
*) Only incomes during study time are counted (Sep-May)	
The study assistance is reduced by 10% for every time the discounted income's limit is exceeded by a sum of 2,000 Finnish marks	50% of the amount by which the assets exceed the discounted income's limit is ranked together with the applicant's combined gross income and the study assistance is reduced accordingly

Student With Dependents

Fully Study Assistance (Study Grant and Study Loan)

Husband and wife's combined gross income	Combined taxable assets
73,000 Finnish marks	100,000 Finnish marks
Sole provider 43,000 Finnish marks	100,000 Finnish marks
The discounted income is	

increased by 17,000 Finnish marks for each underaged child living at home for whom the applicant provides

Reduced Amount

The study assistance is reduced by 5% for every time the discounted income's limit is exceeded by a sum of 2,400 Finnish marks	50% of the amount by which the assets exceed the discounted income's limit is ranked together with the married couples combined gross income and the study assistance is reduced accordingly

If the student has dependents (married or living together with children) the parental income is ignored when the study assistance is calculated. If the student is single and has his/her own income the parental income is also taken into consideration.

The study grant's basic sum is a maximum of 320 marks/month and the accomodation supplement is 360 marks/month for students at university and other institutions of further education. The accomodation supplement is only intended for students living away from home. The study loan is a maximum of 1,470 Finnish marks per month.

There is a supplement to the study grant for the maintenance of underaged children of:

350	Finnish	marks/month	for	1 child
580	"	"	"	for 2 children
830	"	"	"	for 3 children

Students who aquire obligatory foreign language experience abroad, without pay, during term time can have their study loan raised by 2,940 Finnish marks.

The accomodation supplement can be increased if the student is living alone and has high housing costs. The lower rental limit qualifying for an increase is 540 marks/month.

Reduction of the Study Assistance

If the student lives at home the study assistance is reduced as follows:

- the study grant by 25% if the student is under 18 and by 50% if the student is 18 or over

- the study loan by 40%

If, as a consequence of advantages which the educational establishment can offer, the study costs are lessened, the study assistance is also reduced by an amount decided by the State's Central Study Assistance Board.

If the student's and his/her wife/husband's, cohabitant's or parents' income exceed the discounted income limits given above the study assistance is reduced by the given percentages.

The study assistance is granted for whole study months.

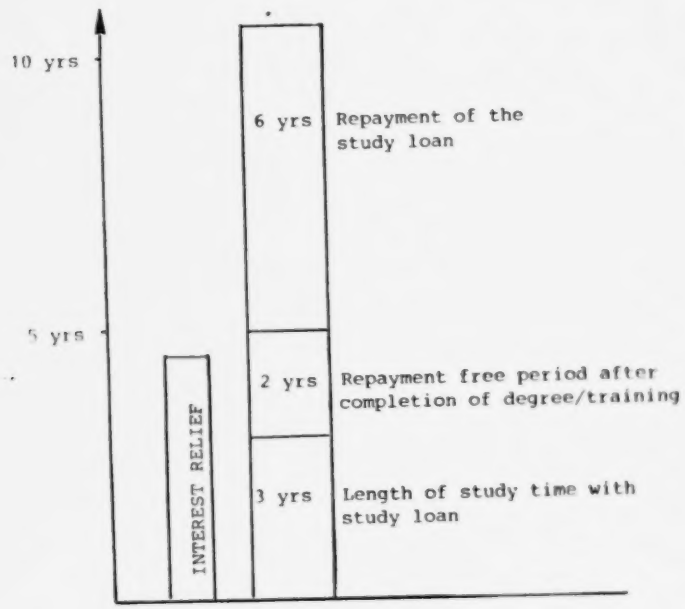
Repayment

The completion of the studies determines when repayment of the study loan shall begin and when the interest charge relief shall cease. The first repayment installment must be paid two years after the interest payment day which falls nearest to the date for the studies' completion. The repayment period is, counting from the first repayment installment, twice as long as the length of time for which study loan was received, although there is an upper limit of 14 years.

The study loan's maximum interest rate is 6.75 per cent. The student pays, as a consequence of the interest charge relief, only 3.25 per cent in interest during the period of studies. This also applies for one and a half years after the date following the interest payment day closest to the date when the studies ended. The remaining interest (3.50%) is paid by the state directly to the bank.

After the interest charge relief has ceased the borrower must him/herself pay the full interest rate of 6.75 per cent. However, this is claimable against income tax.

Figure: Schematic Diagramme of Repayment Conditions.



Postponement of the repayment of the loan is possible in the case of, for example, illness, military service, unemployment, maternity leave or other comparable reasons. It is also possible for an unemployed person to obtain a subsidy to meet the interest charges on the study loan.

The above figures for interest rate, study assistance sum etc. apply to the academis year 1987-88.

The arithmetical example given below clarifies the way in which the rules are applied:

Example: Unmarried student aged 21 living with his/her parents. No income of his/her own. One underaged sister/brother living at home. Parents and children lack assets

		Study Grant Basic Sum 320 Finnish marks/ month	
The student lives in the parental home, therefore, the study grant is reduced by 50% 50% of 320 =		-160	
Parental Income: 136,000 marks/year			
Discounted income -107,000	29,000		
A brother/sister living at home	-17,000		
	12,000		
The discounted income is exceeded by 12,000 marks i.e. by 5 x 2,400 marks which means that the study grant is reduced by 5 x 5% = 25% of 160 =		-40	
		120	120
		Study Loan 1,470 marks/month	
The student lives in the parental home therefore the study loan is reduced by 40%. 40% of 1,470 = 588 marks		-588	882
The parents' taxable income falls below the discounted income limit of 166,000 marks, therefore the study loan is not reduced			0
			882
			1,002

The total study assistance is 1,002 marks/month of which 120 marks are study grant and 882 study loan. No accomodation supplement is payable as the student lives in the parental home.

The maximum maintenance costs for a student living away from home have been calculated as 2,300 marks/months by the State Central Study Assistance Board (January 1986). The minimum living costs for a pensioner amount to 2,200 marks/month which includes state pension and accomodation allowance.

The social assistance norm in Finland is 1,500-1,700 marks which includes the accomodation allowance.

2.5 FRANCE

The aim of the French study assistance is to help families to bear the costs of studies when their own resources are insufficient to enable their son or daughter to study at university or college. The system is composed of direct assistance in the form of grants or scholarships and indirect assistance through subsidized student accomodation and meals. There are very few study loans.

In order to receive a grant for studying at university or college, the applicant must have commenced his/her studies before reaching the age of 26. The studies can be interrupted but the student must be under 26 in October of the year in which studies are recommended. No breaks in studying are permitted after 26.

In the case of students who have custody of their children, the age limit is raised by one year.

The study grant is awarded on socio-economic grounds. The family income i.e. the family's total income forms the base for the calculation of the grant. The student's own income from work undertaken whilst studying is not included.

The family's position is assessed from its total income on one side and expected expenditures resulting from child care responsibilities and other burdens on the family finances on the other. These costs are crudely calculated in terms of points.

The position of each family is matched by a number of points which are assumed to correspond to the financial burden. Each sum of points is matched by an upper income level (calculated after deductions, see example page 34) which sets the limit for receiving a scholarship. The greater the number of points the greater the chance of obtaining a scholarship. If a family's income, after deductions, lies under such a limit, the scholarship is awarded.

The following points have been affixed to given family positions	Points
- Family with one child seeking a scholarship	9
- Children who possess the right to special treatment or are "pupille de la Nation" (children of parents who have died serving their country)	1
- The family home is situated at least 30 km from the university/college	2
- The father or mother alone is responsible for the up keep of one or more children	2
- The father, mother or husband/wife suffers from a long term illness or is incapacitated to at least 80 per cent	1
- For each child in the family in addition to the first	1
- For each child in further education over and above the one applying for a scholarship	2
- For each handicapped child (not 100% resident in an institution)	2
- Close relation of the family who is suffering from a long term illness or is incapacitated to at least 80%	1
- The applicant for the scholarship has a handicap which requires the help of another person	1
- The applicant comes from a Department d'outre-Mer (overseas protectorate/colony) and is studying in the Mother country	1
- The father and mother are both wage earners	1
- The applicant is married and the husband/wife's income has been included in the total family income	1
- For each child in the applicant's care	1

The following table shows the number of points and the corresponding maximum income limits (after deduction) 1986-87.

Number of points	9	10	11	12	13	14	15	26
Income Limit	59,700	66,200	73,100	79,600	86,300	93,100	99,700-	173,000

Within the column for each number of points and upper income limit there is a scale of nine steps or categories showing the size of the scholarship in relation to different income levels. This sequence is evident from the following table. The size of the scholarships, the income limits and income strata are decided each year by the government and adjusted to wage and price changes. The table is used in the following way. When the total number of points has been calculated the column for that total is followed. If the income, after deductions, lies under the maximum limit then the student is entitled to a scholarship. The size of the scholarship is determined by the amount of income, after deductions.

Table: Income (After Deductions) and Scholarship Size.

See next page

Table: Income (After Deductions) and Scholarship Size (1986-87).

Total Points Scholarship F	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26
12,996	35,400	39,300	43,200	47,200	50,700	55,000	59,000	62,900	66,900	70,900	74,700	78,600	82,700	86,700	90,600	94,500	98,400	102,600
11,700	38,100	42,200	46,400	50,800	54,900	59,200	63,600	67,600	71,900	76,200	80,400	84,500	88,900	93,100	97,300	101,700	105,700	110,000
10,656	43,000	47,900	52,800	57,400	62,400	67,100	72,000	76,700	81,500	86,300	91,200	96,100	100,800	105,600	110,400	115,300	117,900	124,900
9,558	45,600	50,800	55,700	62,900	66,000	71,000	76,200	81,200	86,200	91,400	96,500	101,700	106,700	111,800	116,800	121,900	127,100	132,300
8,514	49,400	55,000	60,600	66,000	71,500	77,000	82,600	88,100	93,500	99,100	104,800	110,100	115,700	121,200	126,700	132,300	137,900	143,300
7,452	51,900	57,700	63,200	69,000	74,900	80,600	86,300	92,200	97,900	103,800	109,600	115,500	120,900	126,900	132,600	138,400	144,100	150,000
6,210	54,500	60,700	66,800	73,000	78,900	85,100	91,200	97,300	103,600	109,500	115,600	121,700	127,800	133,800	139,800	146,100	152,200	158,000
4,968	56,800	63,200	69,600	76,000	82,400	88,500	95,000	101,200	107,700	114,000	120,500	126,700	133,100	139,400	145,700	152,200	158,500	164,900
3,762	59,700	66,200	73,100	79,600	86,300	93,100	99,700	106,300	113,100	119,600	126,400	133,100	139,700	146,300	153,100	159,600	166,400	173,000

The following example helps to clarify the rules and their application. It shows a family with four children, two of whom are studying at university/college and where both parents are wage earners.

Calculation of the Base Income:

Combined salary	57,600
Allowance for professional expenditures	- 5,760
	51,840
General allowance 20%	-10,368
	41,472
Rounding off	41,400

Points for Financial Burdens (Charge)

Family caring for one child - the applicant	9
Three children in addition to the applicant	3
A child already in further education	2
Father and mother are both wage earners	1
	15

The table for the calculation of scholarships shows that an applicant with a total of 15 points is awarded a scholarship if the family has an income, after deductions, of, or less than, 99,700 francs.

As the income in the above example is 41,400 francs after deductions the family ends up in scholarship category 9 where the income limit is 59,000 francs. Accordingly the scholarship would be 12,996 francs/year. If their income, after deductions, had been 85,000 the family would have ended up in category 5 i.e. the scholarship would have been 8,514 francs. (The figures concerning income and the amount of scholarship apply to the academic year 1986-87)

There are also a number of supplements to the basic grant. For example military service increases each scholarship category by about 1,000 francs.

Research students or those who are studying to be high school teachers receive an addition to the scholarship.

In 1985 a total of 186,500 students received direct study assistance, of which 168,000 had scholarships, 3,608 study loans and approximately 15,000 grants from university foundations. The state appropriation for direct assistance amounted to 2 thousand million francs. During the same year 1,140,000 students were registered at those universities and colleges of further education at which the study assistance regulations were applicable.

In France, indirect study assistance is also important and, in 1985, it amounted to 1,38 thousand million francs. In total 850,000 students benefited from indirect study assistance. The most common form of indirect assistance is meals provided at subsidized prices. Another example is student accomodation. In 1985, over 100,000 students were provided with a place in a student hostel.

Indirect study assistance is not administered directly by the Department of Education. Instead it is dealt with by a decentralized administration which has offices in 25-30 districts and its central management in Paris. (Centre National des Oeuvres Universitaires et Scolaires, CNOUS.)

The distribution both of the total number of students and of those receiving direct study assistance according to socio-economic status are shown in the below table. It should be emphasized that the data are based on the occupation/employment/position of the head of household and apply to the academic year 1982-83.

Table: The Distribution of Students According to Socio-Economic Groups.

Head of Household Occupation/Employment	Total number receiving scholarships	Total number of students in further education
Farmer	12.6	4.5
Farm worker	0.8	0.4
Small businessman	4.9	8.8
Self employed, higher	1.9	30.9
Self employed, lower	7.3	17.2
Salaried employees	22.5	8.1
Manual worker	24.1	12.2
Care and service personel	2.8	1.0
Artist, sportsman etc.	1.7	6.8
Non-economically active, pensioners	18.5	3.3
No reply, unknown	2.9	6.9
	100.0	100.0

The minimum budget for a foreign student studying in France is set out by the Centre National des OEuvres Universitaires et Scolaires (CNOUS) in a broschure entitled "I´m going to France" (utgivare: Francoise Bouteiller). According to a supplement issued in March 1985 the minimum amounts required per month by a student who receives/does not receive study assistance (indirect assistance in the form of reduced costs for board and lodging) are as follows:

	Paris Area	Outside Paris
with indirect study assistance	2.765-3.755 F	2.705-3.425 F
without study assistance	4.250 F	3.920 F

These are the minimum costs/month. The base amount in France is stated at 2,300 F for 1986 which also forms the least possible grant necessary to cover the costs of the student´s sojourn in France. (Verbal information from the French Embassy in Stockholm, April 1986).

2.6 GERMAN DEMOCRATIC REPUBLIC (GDR) EAST GERMANY

Since 1981 there has been a general study assistance system for students at university, institutes of further education and specialized studies (technical colleges) in the German Democratic Republic. The system is based upon a general grant or scholarship which all students receive irrespective of their parents' or spouse's income. In the GDR the term scholarship is preferred rather than grant. Previously there was a system of means tested grants. This still remains to some extent in that a small additional grant can be awarded in cases of particular hardship.

There are various supplements to the basic grant which are not related to the parents' financial background but rather to the student's own achievements and obligations in relation to society and the collective. A run through of the regulations, as they are set out in an enactment of 11th June 1981, is presented below.

I Basic Scholarship

1. Basic grant	200 marks/month
2. Supplements	
a) Students who have been employed for a certain length of time as a soldier, non-commissioned officer or officer in active service (normally at least 3 years) or an equivalent post	100 marks/month
b) Students who bind themselves to serve as an officer, non-commissioned officer in active service or equivalent post for a certain length of time after they have finished studying	100 marks/month
c) Students who before commencing their studies had been working for at least three years following the completion of their vocational training	100 marks/month
d) Students who are responsible for taking care of one or more children	60 marks/month and child

3. The basic scholarship can be increased by 50 marks/month for students who, because of their social situation and meagre economic circumstances, need special support

4. A student mother who has her first child can obtain a year maternity leave with retained grant. If she does not wish to stop studying she receives an additional 50 marks a month

5. All students with children also receive the general child allowance

6. The basic scholarship is increased by 15 marks/month for students in Berlin

II Achievement Scholarship (Leistungsstipendium)

1. Achievement scholarships are general in the sense that each student can receive such a scholarship if he/she meets the following requirements:

   - has results which can be classed as very good or good in questions on academic subjects and basic knowledge of Marxism-Leninism as well as in practical applications of their learning;
   - is studious and has a model political-moral attitude/ behaviour;
   - actively participates in work for the benefit of society and to promote the DDR and protect the socialist Father Land

2. The achievement scholarship is 150, 100 or 60 marks/month.

3. The achievement scholarship is awarded for a year.

4. Decisions concerning the allotment of achievement scholarships are made by the pro-vice-chancellor in agreement with the FDJ (Freie Deutsche Jugend). Proposals for the allocation of the achievement scholarships are drawn up by the FDJ-leadership. University and College lecturers together with students form a committee which votes on the matter but, in general, the committee follows the FDJ leadership's suggestions.

FDJ is the dominant German Democratic Republic Youth organization which also includes the student movement.

The achievement scholarships are, in other words, awarded on the basis of:

- exam results
- behaviour
- active participation in society

As a rule the student receives the achievement scholarship after the first year of study. Only those who have won an olympiad i.e. a national or provincial competitions in an academic subject in the 10 or 11 class in the gymnasium (EOS=Erweiterte Oberschule) are already able to receive a scholarship for their first year at university or college. To freshmen the scholarships are awarded on the basis of exam results and not because of the "moral" or "social" achievements. Approximately 30-40 per cent of all

students receive an achievement scholarship:

60-70% receive 60 marks/month
15-20% receive 100 "
10-15% receive 150 "

Thus a student can, at most, obtain:

- basic scholarship	200 marks
- gainful employment or equivalent	100 "
- achievement scholarship	150 "
- (supplement for 1 child)	(60) "
- (studying instead of maternity leave)	(50) "

The basic scholarship with the various supplements and the achievement-scholarship run for 12 months of the year. The average income for manual workers and salaried employees was 1,111 marks/month in 1984.

III Special Scholarships

Special scholarships are regarded as particular distinctions and are awarded to a small number of students.

	Amount	Number
Karl Marx-scholarship	550 marks/month	200 per year
Wilhelm Pieck-scholarship	500 "	420 "
Johannes R. Becher-scholarship	450 "	50 "
Salvador Allende-scholarship*)	400 "	50 "
FDJ-scholarship	350 "	300 "

Special scholarships supplement the basic scholarships. The FDJ's scholarship is awarded to workers who have taken a preparatory course and then go on to further education. As a rule 1,100 workers take the preparatory course and 600 enter further education.

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*) Only to students from abroad

Indirect Study Assistance

About 75 per cent of all students live in halls of residence. The price is 10 marks per month for a shared room. In addition lunch costs 0.70 marks (the true cost is 1.50 marks). The students pay only 25 per cent of the travel costs between living area and university place and they are entitled to 50 per cent reduction for all other travel by rail. There are reduced prices for students at theatrical, musical, and sporting events as well as museum visits. All educational material including textbooks are free of charge for the student.

Student Funds

A student fund at a university is built up of government money. The State puts 70 marks per student and year at the disposal of the fund which is used in part to promote cultural activities to reward students that has achieved extra-ordinary results in competitions among their colleagues and to give an occasional social assistance in certain cases.

The minimum cost for maintenance for a student at college or university is officially set at 200 marks/month, a sum on which it is possible for the student to live on if somewhat meagrely. The fact that it is considered to be possible to live on the basic sum of 200 marks is related to the extremely low costs for board and lodging for students.

2.7 HUNGARY

The Hungarian study assistance system has as its aim to remove economic barriers for students who intend to enter further education. Higher education in Hungary is organized in different forms. In addition to the traditional university education there are various colleges for specialized studies. Altogether the Hungarian students can choose from amongst 57 different further education institutes. Each year between 15,000 and 16,000 new students are enrolled in higher education. In total, there are about 63,000 students in the educational system. Entrance to further education in Hungary is restricted but the restrictions are considered to be more liberal than in other socialist countries in the Eastern Block.

Education is free in Hungary, however students who do not achieve the average results (3.5) must pay a fee of between 300 to 1,000 forint per term depending on their parents' income.

The degree or course also includes summer courses or holiday work for a month in addition to the ten months for which study assistance is paid. Holiday work, which is normally obligatory, is remunerated.

The study assistance available can be described under the following headings:

- social welfare study assistance to provide equal opportunities
- financial assistance awarded according to grades attained
- scholarship of the republic
- scholarships from big business
- scholarships from the military sector
- subsidized accomodation and meals
- protection against unplanned price rises
- cultural benefits

Social Welfare Study Assistance to Provide Equal Opportunities

The social welfare study assistance is means tested against the parental income and is paid in advance. This assistance forms an important link in efforts to even out differences in study opportunities for different income groups. This is one way of removing financial barriers to further studies. The student receives a clearing paper at his home address in which the grounds on which money can be sought and granted are set out. In the processing of the applications, regard is paid to the location of the institute of further education in relation to the home, and also to whether the house lies in an urban or rural location. There is an upper limit with regard to the parents' income. The number of children in the family is also important. The social assistance varies between 200-3,700 forint/month.

A student who lives in the parental home in the town where the institute of further education is located can obtain a maximum of 2,900 forint per month. Whereas a student whose home residence is elsewhere than the place of study can receive a maximum of 3,700 forint/month. The amount is altered annually in order to take account of price changes. Students living in student accomodation have to pay for board and lodgings. However, the charges are generally low. The social assistance together with the scholarships (the financial assistance) gives an industrious student, without private means, the possibility to support him/herself.

The student committee(s), which are comprised of between 15 to 20 people, also has some influence in the allocation of the social assistance, as is the case with the awarding of scholarships. The committee, which is considered to know the students' needs best, makes suggestions as to how the social assistance should be allocated amongst the students. The committee is given a certain sum to distribute, depending the Ministry of Education's allocation. The committee's proposals have a certain significance for the Ministry's decisions.

In total about 60 per cent of students receive social assistance in varying amounts. The student is not required to repay the

social assistance. In order to provide an idea of the value of this study assistance, it can be mentioned that the average wage in 1986, for a Hungarian worker was 5,000 forint/month.

Financial Assistance Awarded According to Grades Attained

The financial assistance which is awarded according to the results achieved is paid in the form of scholarships. The size of the scholarship depends, in each case, on the individual's exam grades in comparison with fellow students. The scholarships are paid out retrospectively each term.

The exam results are graded from 1 to 5, with 5 being the highest grade. The average student has grades of between 2.5 and 3.75 whereas those students who are above average have results of between 3.76 and 4.50. The remaining group who have grades of over 4.50 are called the elite. The grades form the basis for the size of the scholarship.

The variation in scholarships for the average results relates to the student committee's assessments. It is not only the exam results which are rewarded but also other attributes such as helpfulness, comradeship, behaviour etc. This assessment is made by the student committees. In total about 40 per cent of students receive assistance in the form of scholarships, which are given for 10 months per academic year. The size of the amount varies from 200 up to 2,400 forint per month. Very few students get the highest scholarship.

The Scholarship of the Republic

A special achievements scholarship has been set up to encourage the cleverest students. This is called the "Scholarship of the Republic". In order to receive such a scholarship, the student must have obtained grades of over 4.5 during two academic terms.

In addition to these very high academic requirements, there are a number of other criteria laid down for the awarding of the scholarship of the Republic. A student who aspires to such a scholarship must also take part in various social activities.

Active involvement in sports and voluntary organizations is considered to be of particular merit. Participation in research work and study groups together with fellow students is also rewarded. Finally, a positive attitude to education in general is valued highly. However, these other criteria have, over the years, reduced in importance.

The decision to award a student a scholarship of the Republic is taken by the Ministry of Education on the suggestion of the local scholarship committee at the university. The scholarship is worth 2,500 forint per month. Normally, about 700 students receive this scholarship each year, which approximates to circa 1 per cent of all students.

Scholarships from Big Business

It is also possible for a student to obtain a grant from a firm. Students receiving grants from business are normaly contract bound to work for the firm in question for a certain length of time after they have graduated, usually 5 years. The size of the scholarship can vary from 1,500 up to 5,000 forints/month. In 1986/87 about 1 per cent of all students had grants financed by businesses.

The number of scholarships provided by firms has reduced during the last few years partly as a result of the austere economic situation in Hungary and partly because, in a time of poor prospects for improved earning capacity, the students do not want to be bound to a particular firm for 5 years. They consider that it is very important to have the freedom to change their job in order to get better pay if the possibility should arise.

A further advantage which these who choose to accept a business scholarship can count on, is a loan when they set up their frist home. In certain cases a loan to build one's own house can even be included in the benefits attached to a business scholarship.

Scholarships from the Military Sector

Youngsters who have done a certain special type of military service can receive a military scholarship for university studies. The scholarships are intended to form the basis for a student who wants to procure a civil occupation efter the completion of his military service but can even be used for in-service training for certain types of military positions. Over a hundred scholarships are paid out each year. The size of the scholarship varies from case to case but is not more than the social study assistance.

Subsidized Accomodation and Meals.

About 45,000, of the approximately 63,000 students at university and colleges of further education, need some form of living accomodation. The state provides student rooms for approximately 30,000 students. The remainder normally procure board and lodgings in the place where they study. The average rent for a student room for the academic year 1986/87 was 600 forint/month. The average cost for the state of such a room is 2,000 forint per month and bed. The room can only be rented during term time. The rent for private board and lodgings follows the market prices for rented accomodation in Hungary and is much hugher than for a student room. There is also an accomodation agency organized by the students union. In this case the rents are frequently on a level with those charged for a student room.

Each student hostel and every educational establishment has a special student refectory. The refectories are often run as private businesses but there is generally very close cooperation between them and the university. The university's role is, amongst other things, to guarantee a very low price for the meals and generally supervise the proceedings. The aim is to provide the students with nutritions and good food at a low price.

These reftories provide the students with the opportunity to eat, at heavily subsidized prices, two meals per day. The students pay approximately 25 forint per day for their melas. Despite the very low prices only about half of the students make use of these

facilities. Students often form their own food collective or organize their food themselves.

Protection Against Unplanned Price Rises

In recent years the prices policy has undermined the study assistance. In order to ameliorate the consequences, the students receive 290 forint/month for unplanned price rises. This supplement is paid regardless of the student's social circumstances. The supplement is paid out for 12 months.

Cultural Benefits

A final, but not unimportant, type of assistance is the advantages the student union identity card means in terms of cheap travel, low rental costs for technical equipment, free entrance to museums and reduced prices for theatre and cinema tickets. There is no complete overview of what the different benefits cost the Hungarian state. However, the state's share of the costs of the cultural benefits alone amounts to 20 million forint per year.

The Student Body's Social Composition

The aim of the Hungarian study assistance system is not to achieve a more socially balanced recruitment to further education. Instead the goal is to remove financial barriers to studying. The attainment of a socially representative student body is to be achieved by other methods than study assistance. At the end of the 1940s and the beginning of 1950s there was an educational reform which meant that the equivalent to the higher school certificate (G.C.E. A levels in England) was abolished as the entrance requirement for further education. This led to a considerable change in the social composition of the student body with the children of manual workers and farm labourers forming about 50 per cent of the students. However, the reform did not produce lasting results. By the beginning of the 1960s the social composition had returned to the pre-war situation with a traditional and very uneven socio-economic recruitment of students.

This led to new measures of both a financial and social character. However, study assistance was considered to be an insufficient means to achieve social equalization. The question of who sought entrance to university and other institutes of further education was determined more by the tradition within the family, by expectations, language ability and a home environment conducive to studying.

In order to stimulate children to study further an attempt was started at the beginning of the 1970s to set up special courses, at weekends and during free time, to prepare pupils for university/college. These courses were aimed partly at increasing the level of knowledge of high school pupils, partly at providing information on university studies, and partly, and perhaps most important, at reducing the pupils' anxiety and familiarizing them with further education. Of crucial importance was the fact that the preparatory courses were run by university students from the same social stratum as the high school pupils.

After a 10 year trial period the system of preparatory courses has been made permanent. In particular, concentration has been focused on technical education and agricultural training. The present day social recruitment to technical and agricultural courses corresponds better to the socio-economic composition of society at large. About 40 per cent of the students studying these subjects come from working class homes whereas only 4-6 per cent from the same social stratum end up in the traditional university courses.

It is difficult to judge whether the scholarships are sufficient for a student to live on. It has not been possible to procure an officially published existence minimum. Most probably, the social scholarship, if received without reductions, covers the student's basic necessities. However, it is clear that a student who comes from a less well off environment and who achieves very high study results can receive a very large scholarship.

2.8 IRELAND

The current Irish study assistance system was introduced in 1968 and replaced an earlier local study assistance system which was financed by local government. The study assistance is paid in the form of a grant. This covers both the university or college fees, the student's living costs and costs for course literature. However, the grants are not general in character but are means tested against the parents' income and any possible assets and income the student may have.

The major part of the finance for the grants is provided by the state with local government contributing a lesser amount. The local government share varies from local authority to local authority, however it corresponds to the contribution they made before the new study assistance system was introduced in 1968. The grants are intended to be a direct financial support for students so that they can continue or begin different courses within the higher education system, which is called "third-level education".

The Current Study Assistance System

The Higher Education Grants Scheme is administered by the County Councils and County Borough Corporations.

Eligibility for higher eduction grants is basically determind on four grounds i.e. age, residence, means and attainments.

(a) Age
A candidate shall not normally be less than 17 years of age on 1st January of the year after the year he/she sits for the Leaving Certificate Examination.

(b) Residence
For a candidate to be eligible for a grant his/her parents or guardians should have been ordinarily resident in the administrative area of a Local Authority in the Republic on 1st October of the year preceeding the year in which he/she sits for the Leaving Certificate Examination.

(c) Means and value of grants

For a candidate to be eligible for the award of a grant the total income of his/her parents or guardians for the year ended 31st March of the year he/she commences an approved course of third-level education must conform to the means test requirements in the scheme of the year he/she sits for the Leaving Certificate Examination.

The income to be reckoned for the purpose of the H.E.G. Scheme is the gross parental income, as accepted by the Revenue Commissioners, excluding only superannuation contributions.

(d) Attainments in the Leaving Certificate Examination

A candidate must obtain successes as follows in the Leaving Certificate Examination:

(i) Grade D or a higher grade in at least five subjects, or in four subjects including Irish, and

(ii) either (1) Grade C or a higher grade in Higher Level papers in four or more subjects, or (2) Grade C or a higher grade in Higher Level papers in Irish and in two other subjects or in Mathematics and in two other subjects, or (3) in the case of a candidate who will pursue an approved course in Science (including Agricultural Science) or Engineering, Grade C or a higher grade in Higher Level papers in two of the following subjects: Mathematics, Applied Mathematics, Physics, Chemistry, Physics and Chemistry, Agricultural Science, Technical Drawing, Agricultural Economics

Note 1 The successes required at (i) may, of course, include the successes required at (ii).

Note 2 The successes required at (i) may be obtained in the Leaving Certificate Examination of one year and the successes required at (ii) may be obtained in the Examination of a different year but the successes required under either heading may not be obtained by accumulation..

The closing date for application for a grant to a County Council or Corporation is normally 31st August of the year the candidate will commence a course of third-level education.

It should be added that, in principle, only courses at Irish educational institutions which meet the standards laid down by the state are recognized as qualifying for grants.

The grants are composed of two parts, one of which covers the fees, the "lecture fee grant", and the other the student's living and other study costs, the "maintenance grant". There are two different levels for the latter part of the grant, a lower level for students who live at home and commute to university and a

higher level for those who must live away from home. The largest amount a student living at home could obtain for the academic year 1984/85 was £400. The equivalent maximum for a student living in another city/town than the normal family residence was £1,160. These figures were the result of adjustments in 1981 and 1985, the increase from 1980 to 1981 was 66 per cent. The ideas behind the study assistance system can be described by the following figure:

Figure: The Relationship Between the Parental Contribution and the Grant for Maintenance and Study Costs.

Total grant maintenance and fees grants	=	Means tested grant from the State	+ Parental Contribution according to the scale laid down by the State

In the means testing, regard is paid to both the student's family's income, and to the student's own assets. The number of children under 16 living at home who are entitled a reduction in the parental contribution is set at a maximum of six per family. In 1981 the limits for the family's permitted income were raised dramatically. The rise was almost 50 per cent from 6,100 to 12,000. The 12,000 limit applied to families with several children.

The study assistance in Ireland is general in the sense that all students who meet the formal requirements obtain a grant. Through the changes made in the income scales prior to the academic year 1981/82, the number of students with grants increased considerable. The increase in the number of grants between 1980/81 and 1984/85 was 6,451 i.e. there was a 126 per cent rise. In total 11,572 grants were awarded for 1984/85. The total number of students in higher education was, that year, approx. 31,434 (this figure does not cover various vocational training programmes only university courses or the equivalent are included). This means that approx. 37 per cent of all students received a grant for the academic year 1984/85. The proportion of students with study assistance has remained largely the same since 1984/85.

Most of the students do not have a full grant instead they

receive a grant which is reduced depending on their parents' income or their own assets. The way in which the grant is affected by the parents' income is illustrated in the below table:

Table: Maxima of Reckonable Income and Relevant Grant Categories for Students Not Living at Home for 1985.

See next page

Students who are not satisfied with the decision taken by the local study assistance authority can appeal against the decision to the Minister of Education. The decision made by the Minister of Education is not open to appeal. The Irish study assistance system is generally considered to be heavily regulated and the various limits which are set absolute and not open to interpretation. Despite this, it does occur that the Minister of Education finds in favour of students when the appeal concerns interpretation of the regulations.

The social background of the grant recipients has not been determined but, because of the regulations for means testing, the social background of the grant recipients is expected to be at the lower end of the socio-economic scale. One critic of the grant scheme is that the Grant Schemes are said to favour farmers and self-employed, due to difficulties in the control system of their family income. The grant for maintenance is simply constructed out of available financial resources. The State has not deemed it adequate to live on. It serves only as a form of economic assistance to students in higher education.

NUMBER OF DEPENDENT CHILDREN IN FAMILY	MAXIMA OF RECKONABLE INCOME AND RELEVANT GRANT CATEGORIES								
	Not exceeding	Not exceeding	Not exceeding	Not exceeding	Not exceeding	Not exceeding	Not exceeding	Not exceeding	Exceeding
1 or 2	£ 8,880 A/G	£ 9,546 B/H	£10,212 C/I	£10,878 D/J	£11,378 1 F	£11,678 2 F	£11,878 3 F	£12,078 4 F	£12,078 -
3	£ 9,546 A/G	£10,212 B/H	£10,878 C/I	£11,544 D/J	£12,044 1 F	£12,344 2 F	£12,544 3 F	£12,744 4 F	£12,744 -
4	£10,212 A/G	£10,878 B/H	£11,544 C/I	£12,210 D/J	£12,765 1 F	£13,265 2 F	£13,565 3 F	£13,765 4 F	£13,765 -
5	£10,878 A/G	£11,544 B/H	£12,210 C/I	£12,765 D/J	£14,152 1 F	£14,652 2 F	£14,952 3 F	£15,152 4 F	£15,152 -
6 or over	£11,544 A/G	£12,210 B/H	£12,765 C/I	£13,320 D/J	£15,540 1 F	£16,040 2 F	£16,340 3 F	£16,540 4 F	£16,540 -

Amount of grant/scholarship payable to students
(i) whose normal family residence is not in or adjacent to a university town, or
(ii) whose course is not provided in an educational institution adjacent to his/her normal family residence.

Category A: Lecture Fee plus £1,160
" B: Lecture Fee plus £928
" C: Lecture Fee plus £696
" D: Lecture Fee plus £464
" 1 F: Lecture Fee only (not exceeding £1,226)
" 2 F: Lecture Fee (not exceeding £ 919)
" 3 F: Lecture Fee (not exceeding £ 613)
" 4 F: Lecture Fee (not exceeding £ 306)

Amount of grant/scholarship payable to students
(i) whose normal family residence is in or adjacent to a university town, or
(ii) whose course is provided in an educational institution adjacent to his/her normal family residence.

Category G: Lecture Fee plus £464
" H: Lecture Fee plus £371
" I: Lecture Fee plus £278
" J: Lecture Fee plus £185
" 1 F: Lecture Fee only (not exceeding £1,226)
" 2 F: Lecture Fee (not exceeding £ 919)
" 3 F: Lecture Fee (not exceeding £ 613)
" 4 F: Lecture Fee (not exceeding £ 306)

2.9 POLAND

The fundamental principle behind the Polish study assistance system is to remove all financial obstacles or barriers which make it difficult for students to study at university or other further educational establishments. The costs of further education are, in principle, borne by the state. This applies even to the student's up keep and expenses for course literature in those cases where the parents are unable to meet the costs. The most common situation is that both the state and parents contribute to the student's maintenance and study expenses in that the study grant is means tested against the parents' income.

The study assistance system has two different forms:

- maintenance grant (financed by the state)
  - means test based grant
  - attainments based grant
- maintenance grant (financed by business)

In addition to these two types of assistance there are also various indirect kinds of assistance and assistance for special situations e.g. crisis aid. The different forms of study assistance are described below:

Grant for Up Keep and Study Expenditures From the State

Means Test Based Grant

This grant is constructed to cover the student's costs during his/her studies. The grant is means tested against the parents' income. The value of the grant is set annually by the state. This is done by a calculating the extent to which a student can normally be assumed to be in need of financial support during his/her studies. Such a calculation can be schematically summarized in three points and with the following amounts for 1984:

1. 2,000 zloty per month for accomodation. This sum refers to Warsaw and is somewhat lower in other parts of Poland.

2. 3,500 zloty per month for meals. This sum represents the cost of eating all meals every day in the student canteen. 1,000 zloty out of the 3,500 zloty go directly to the canteen in the form of a grant. The remaining 2,500 zloty are at the students disposal if he/she wishes to eat elsewhere than in the student canteen.

3. A certain amount is also allocated for the purchase of study material. The sum varies from year to year depending on the current market prices. In 1984 the amount was 3,100 zloty.

Thus, the total value of a full grant was 8,600 zloty per month in 1984, which is assumed to be the amount that the student needs every month in order to be able to live in a reasonable way whilst studying. This sum is reduced by a proportion of the parental income. The size of the proportion of the parental income by which the grant is reduced is calculated in the following way: If the family's monthly income is 18,000 zloty and there are four members of the family the reduction is 18,000:4=4,500 zloty. The grant, in the example, is reduced by 4,500 zloty and is, instead of 8,600 zloty, only 4,100 zloty per month. The average income for an industrial worker is about 18,000 zloty per month.

If the student is over 25, there is no means testing against the parents' income. The grant is normally paid out during term time i.e. 10 months per year. In cases of particular hardship the grant can be given for the whole year.

According to figures from the Polish Ministry of Education, about 60 per cent of all students had grants for the academic year 1982/83. On average they obtained 3,792 zloty per month. A year later this figure sank to only 2,500 zloty. The reason for this was that a new policy was introduced according to which 1,000 zloty were directly transferred, as a subsidy, to the student canteen. As a result of this reform, students who had only 1,000 zloty per month in grant were completely without grant. However, they were given the right to subsidized meals in the student canteen.

Married students or single students with children are entitled to additional grants. The size of these is fixed at 50 per cent of the lowest wage for full time employment within the public sector, at present 50 per cent of 5,400 zloty.In addition, mothers have the same right to maternity leave as economically active mothers, currently two years paid leave.

The Attainments Based Grant

In order to encourage students who achieve particularly satisfying results, an attainments grant has been introduced from the academic year 1985/86. A student will be able to receive this grant if his/her average mark for all examinations is over 3.7 on a 5 grade scale. The better the results, the larger the sum of money the student receives. The actual grant amounts are set out in the following table:

Table: Value of Attainments Grants for Students at University

Average Mark	Grant Amount
3.70 till 3.99	2,800 zloty
4.00 till 4.24	3,500 zloty
4.35 till 4.49	4,500 zloty
4.50 till 5.00	4,900 zloty

This grant is entirely dependent on the student's results and is not means tested. According to the government's estimates 22 per cent of the student population are likely to obtain such attainments grants.

Maintenance Grant from Firms

It is also possible for a student to obtain a grant from a firm. Students receiving grants from business are normally contract bound to work for the firm in question for a certain length of time after they have graduated, usually three years. If the contract is broken earlier, the student must repay the grant to the firm. In 1983 about 7 per cent of all students had grants financed by businesses.

Some Other Types of Study Assistance

There are also various types of indirect support in the Polish study assistance system. Amongst the most important are free health care which all students receive. Free health care includes free dental treatment. In this context even the "crisis money" should be mentioned. At the moment this can be up to an additional 1,500 zloty per month. The students can obtain this money if they have been ill for a longer period or can, in some other way, substantiate that they are in need of extra support. It is the Faculty Board's Grants Committee which is responsible for taking the decision to give a student crisis aid.

There are also different kinds of travel allowances and it is possible for students to purchase tickets at reduced prices for various cultural activities.

An Illustrative Example

An example is now presented in order to elucidate the Polish study assistance system. Assume that a student belongs to a family with 3 children and where only the father works. The father is a bus driver and earns approximately 20,000 zloty per month.

The Means Tested Grant

The families income:	20,000 zloty per month
Number of family members:	5 (2 adults and 3 children)
The familiy's per capita income:	4.000 zloty per month
Maximum Polish Grant	8.600 zloty per month
The student receives:	8.600-4.000 zloty = 4.600 zloty per month

The Attainments Grant

The student is successful in his studies and obtains an average grade of 4.26. This gives him an attainments grant of 4,500 zloty per month.

Our student has now obtained a means tested grant of 4,600 zloty and an attainments grant of 4,500 zloty i.e. a total of 9,100 zloty per month.

Business Grant

Our student is offered a grant of 4,500 zloty per month by a firm which he accepts. Thus our student has, by taking advantage of available grants, been able to obtain 13,600 zloty per month in grants. This sum corresponds to 2/3rds of a industrial worker's wage in 1985.

The Student Population's Social Composition

In Poland the primary aim of study assistance is not to even out the skewed distribution of different social groups. The Polish state aims at combating the problem of over representation of certain social groups in further education by other means than study assistance. Study assistance is seen purely as a means of helping those who want to study in further education.

It is difficult to determine whether a Polish student who only obtains the maximum means tested grant of 8,600 zloty/month can support himself on his grant. No official existence minimum is published in Poland. Most probably the maximum means tested grant covers the basic necessities.

In summary, it can be stated that the Polish study assistance system is decentralized with regard to the various allocation decisions. The decisions concerning the awarding of several types of assistance are taken by the Faculty Board's Grants Committee. This Committee is assisted by representatives of the teachers, the students, and the students union when decisions concerning study assistance are processed. The students participate by

voting on the decision. The teachers and the student union's representatives do not have the right to vote.

A student has the right to appeal against the Faculty Board's Grants Committee's decision. The appeal is made, in the first place, to the Dean of the Faculty and, in the second, to the Ministry of Education.

2.10 SWEDEN

The Swedish system of financing higher education was introduced in its present form in 1965. The study assistance is composed of two different parts, a repayable loan component and a grant component. Students with children can obtain an additional allowance which must also be repaid. Further, it is possible to request extra money if studies are particularly costly.

The amount of money that the student receives as study assistance is altered from year to year depending on changes in the base amount (existence minimum) used in the social insurance system. This minimum was set at 4,000 Swedish crowns (SEK) in 1957 when the Supplementary Pension (ATP) was introduced (see Elm`r, Å.: Svensk socialpolitik, Lund 1983). Study assistance is calculated as a per cent of the base amount. In that the base amount is index linked, the value of study assistance is thus stable. In the beginning it was decided that study assistance should be 140 per cent of the base amount. This percentage was increased in January 1985 to 145%. The below table shows the growth of study assistance and the base amount from 1965 to 1987.

Table: The Increase in the Base Amount and Study Assistance During the Period 1965 to 1987.

Year	Base Amount	Study Assistance	Additional Allowance for Children
1965	5,000 SEK	7,000 SEK	1,250 SEK
1970	6,300 SEK	8,820 SEK	1,575 SEK
1975	9,000 SEK	12,600 SEK	2,250 SEK
1980	15,400 SEK	21,560 SEK	3,850 SEK
1985	21,800 SEK	31,626 SEK	5,454 SEK
1987	24,100 SEK	34,950 SEK	6,030 SEK

Source: DsU 1984:13 Differentierade studiemedel. Utbildningsdepartementet. Liber 1984 and information from The National Board of Student Financial Aid.

Thus the value of the study assistance has increased in pace with the general rise in prices. The sum has grown from 7,000 to 34,950 SEK over a 22 year period. The repayable study loan follows the general price trend to the extent that this is reflected in the base amount. However, this is not the case with

the grant component which is not index linked and consequently has declined as a proportion of the total study assistance. When the study assistance system was introduced, the grant component accounted for 25 per cent of the total study assistance sum i.e. 25 per cent of 7,000 SEK = 1,750 SEK. Although the sum has been adjusted twice, the grant has been 2,178 SEK since 1976 which is 6.23 per cent of the study assistance sum in 1987. Thus the grant proportion of the study assistance has reduced considerably, from 25 per cent in 1965 to 6.23 per cent in 1985.

The addition study loan a student with children can receive is fixed at 25 per cent of the base amount. Thus the value of this study loan is also stable in the sence that it is tied to changes in the base amount.

As mentioned above, extra study assistance can be paid. A student who can substantiate that his/her studies are especially expensive can obtain a repayable supplement to the basic study loan.

Study assistance can be paid for both full time and part-time studies. Students who take the courses normally offered at university are regarded as studying full-time. These courses are 20 weeks long and award a similar number of points per term. Courses which, for example, comprise 20 points but which are planned to be read over a longer period than 20 weeks are classed as part-time. Normally it takes 40 weeks to read 20 points on a part-time course.

Study assistance can be paid until the student has reached 45 years of age. This limit was set in 1969. If there are special grounds, study assistance can even be paid to older students. The upper age limit lies, in practice, between 50 and 55. The study assistance is only paid, in principle, for 12 terms i.e. six academic years. Even in this respect a student can, if there are special reasons, obtain study assistance for further terms.

Study assistance is paid to a Swedish student regardless of his/her parents' or husband's/wife's income or assets. On the other hand, study assistance is means tested partly against the

student's own income and partly against his/her assets. The amount of study assistance is reduced if the student's income is above a certain level. This level is index regulated in the same way as the base amount and was set, in January 1987, at 13,260 SEK/half year and the allowed private means at 144,600 SEK. If the student's income is more than 91,580 SEK per year or his assets are over 226,000 SEK no study assistance is payable. In the case of incomes or private means below this amount, a reduce study loan is payable according to a special scale.

Another requirement of the Swedish system is that the student must from, and including, the third study term be able to show acceptable exam results in order to be able to obtain further study assistance. For most courses, the student is required to have completed 15 out of a possible 20 points in order to receive study assistance for the following term's studies.

In Sweden the academic year usually begins the 1st September and ends the 1st June the following year. This means a 9 month study period. The amount of study assistance normally paid is set out below. The sum is for the first half year 1987 as the table beneath shows.

Table: Study Assistance Amount per Month First Half Year 1987

Highest Amount	Full-Time Studies	Part-Time Studies
Grant	242 SEK	121 SEK
Loan	3,630 SEK	1,815 SEK
Total Sum	3,872 SEK	1,936 SEK
Additional Child Allowance Loan	670 SEK	335 SEK

Government expenditure on study assistance for students in higher education was, for the academic year 1985/86, 3,042 million SEK. Grants accounted for 205 million SEK of this sum while loans to students accounted for 2,837 million SEK. The money was awarded to 117,000 students.

Repayment of Study Assistance

Students who have incured debts for their studies must repay the loans after the completion or discontinuation of their studies. Repayment begins two years after the last study loan was taken. The length of time for repayment depends on the student's age. In principle, the study loan must be repayed by the time the student is 50. This means that a young student can spread repayment of the study debt over a greater number of years than a mature student which also results in lower amortization charges. If a student is allowed to defer repayment by a year his repayment period is extended i.e. the final repayment year is when the student is 51 years of age. If a student has had many prolongations, the age limit by which repayment shall have been made is 65. Debts which have not been paid before the age of 66 are written off.

The income limits which, in 1987, entitle a deferment are 84,400 SEK for a student without children, and 108,450 SEK for a student with children.

The study assistance money is exempt from traditional interest charges, but each year the sum is increased by an amount which is currently 4.2 per cent of the study debt. In certain cases the repayment of the study debt is, during the first years, less than the annual increase in the debt. Thus it can be said to be an interest on interest account, which can mean that, in the beginning, the study debt continues to grow despite repayments.

The following table shows the repayment plan for a student with a 20 year repayment period and a debt of 40,000 SEK:

Table: Repayment Plan

Year	Debt at 1 January	Repayment Charge	Debt after Repayment	Index 4.2%	Debt of 31 December
1	40.000	2.000	38.000	+1.596	39.596
2	39.596	2.084	37.512	1.576	39.088
3	39.088	2.172	36.916	1.550	38.466
4	38.466	2.263	36.203	1.521	37.724
5	37.724	2.358	35.366	1.485	36.851
6	36.851	2.457	34.394	1.445	35.839
7	35.839	2.560	33.279	1.398	34.677
8	34.677	2.668	32.009	1.344	33.353
9	33.353	2.780	30.573	1.284	31.857
10	31.857	2.897	2.896	1.216	30.716
11	30.176	3.019	27.157	1.141	28.298
12	28.298	3.146	25.152	1.056	26.208
13	26.208	3.278	22.930	963	23.893
14	23.893	3.416	20.477	860	21.337
15	21.337	3.559	17.778	747	18.525
16	18.525	3.708	14.817	622	15.439
17	15.439	3.864	11.575	486	12.061
18	12.061	4.026	8.035	337	8.372
19	8.372	4.195	4.177	175	4.352
20	4.352	4.352	0	0	0
Tot.		60.802		20.802	

Source: DsU 1984:13 Differentierade studiemedel. Utbildningsdepartementet, Liber 1984.

In January 1986 there was a total of 865,000 study loans and the combined study debt was 32.7 thousand million SEK. Of the 865,000 borrowers, 600,000 were obligated to repay during 1986. Altogether they repaid 1,125 million SEK. 84,000 deferred their repayments, which accounted for 14 per cent of all those who should have repaid a part of their study loan during 1986.

Some Concluding Remarks

One aim of the Swedish study assistance system is to remove various financial barriers for university and college studies. Thereby making possible an equalization of social groups within

the student body. In the beginning there was a social equalization. However, this process has ceased and the social composition of the student body is largely the same today as it was before the study assistance system was introduced. The difference, compared with the previous situation is that the number of students from the lower social groups has risen. However, this increase has not affected the socio-economic distribution as it has been matched by a corresponding growth in the number of students from the higher social strata. Thus, the study assistance system has not been able to achieve a more equitable social composition of the student body.

The Swedish study assistance system has only been changed marginally during the 20 years it has been in existence, nevertheless it has been subject to much adverse comment, above all from the students. Criticism has been directed mainly at the student's growing study debts but also at the size of the study grant. The students want to re-establish the level of grant which existed when the system was set up. These and many other problems associated with the present study assistance system are currently the subject of a State Commission. The Commission is expected to produce suggestions for a revised system which keeps within the existing expenditure framework.

According to the Consumer Protection Council's estimation, the monthly budget required in 1987 by a male student is 4,000 SEK and a female student 3,800 SEK. Accomodation costs (student room) are included in this sum.

The Swedish Tax Authorities' regulations valid from 1st January 1986 (RSFS 1985:44) set 2,195 SEK/month as the limit at which income tax becomes payable. Accomodation costs are not included in this sum.

The social assistance norm is based on base amount - an index linked sum set by the Government which forms the basis for the calculation of pensions etc, and amounts to 2,300 SEK/month excluding accomodation costs.

3. Problems and Delimitation in a Comparative Analysis

The descriptions of countries presented in the previous section provide a comparative material which is difficult to grasp. Accordingly, important elements of the study assistance programmes are brought together in the below table which provides a more collected picture.

Table 1. Summarized Overview of the Study Assistance Systems in Ten Countries

See next page

The table shows considerable varations in the different elements of the countries' study assistance. The most obvious is, perhaps, the variation in the form of the assistance between the countries: grants, scholarships or loans. Naturally it is more advantageous for the individual to receive a grant or a scholarship than to be directed to apply for a loan which must be repaid. It should be pointed out that in countries which only have grants or where grants form a major part of the study assistance, means testing is evident and many of the students receive no money at all or only a fraction of the total grant. In a number of countries the grant is so meagre that students must depend on other sources of income in order to have enough money to live on.

In countries which have only study loans or where the loan comprises the major part of the assistance there are often features which have considerable advantages for the borrower. For example the loan may be interest free and it may be possible to defer repayment under certain circumstances.

Seen from one perspective (above all that of the recipient of the grant) it appears to be advantageous with a grant or scholarship, however from another view point (society's) a loan system can be preferable.

The variations in the form of study assistance provide an example which illustrates the difficulties involved in making a comparative analysis of study assistance policy in different countries. The regulations applicable in each country are

Country	Form of assistance	Means testing*	Max.amount	Attainments Reward	Repayment Interest/Index	Repayment Time	Repayment Deferment	Financed by	Paid for	Max.age limit	Percentage with study assistance
AUSTRIA	Grant	Yes	38,000 sch/ year[2]	Yes	-	-	-	The State	Term	36 yrs	12%
ENGLAND	Grant	Yes up to 25 yrs	£2,165/year[1]	-	-	-	-	The State	Academic year		40% full grant 50% means tested
WEST GERMANY	Loan	Yes	710 DM/ month	Yes	-	20 years	Possible	The State	11 month/ year	30 yrs	35% of those who are entitled to apply
FINLAND	Grant 29%	Yes up to 24 yrs	680 FM/ month	-	-	-	-	The State	Study month		Approx. 60%
	Loan 71%		1,447 FM/ month[2]	-	6.75% of which 3.25% subsidized	14	Possible	Bank	Study month		
FRANCE	Grant	Yes	12,996 F/yr	-	-	-	-	The State	Study time	26 yrs	Approx. 14%
	Very few loans					10 years	-	The State			
EAST GERMANY	Scholar-ship	No	450 mark/ month[1]	Yes	-	-	-	The State	Calendar year		100% have the basic scholarship
HUNGARY	Scholar-ship	-	2,400 forint/ month[3]	Yes	-	-	-	The State	10 months		40%
	Grant	Yes	3,700 forint/ months[2]	-	-	-	-	The State	10 months		60%
IRELAND	Grant	Yes up to 25 yrs	£1,160/year[2]	-	-	-	-	The State+ Local Gov.	Academic year		37%
POLAND	Grant	Yes up to 25 yrs	8,600 zloty/ month[3]	Yes	-	-	-	The State	Study month		60%
SWEDEN	Loan	No	3,630 kr/ month[2]	No	4.2%	Approx. 25 yrs	Possible	The State	Study time	45 yrs	88% educational line
	Grant	No	242 kr/ month	-	-	-	-	-	-	-	60% of all enrolled

N.B. * Means testing against the parents' income and assets

1) The amount is greater or equal to the officially estimated cost
2) The sum is less than the officially estimated minimum cost
3) Information not available on the minimum income

concisely formulated and leave little scope for discretion in the individual decision making.

4. Conceptual Framework

It appears to be necessary, at this point, to state the over all conception of study assistance and its socio-political context.

In various publications, most recently in the Swedish Government's terms of reference for the State Commission on Study Assistance (Department of Education's directive 1985:33) the state study assistance is declared to be, in the first place, an instrument for the realization of society's educational policy goals. In the absence of a public educational policy, the state study assistance would probably have a different appearance from its present. Without going in to detail, the assumption is made here that, in the main, the study assistance's design is determined by the educational policy being pursued, but is also partly influenced by other policies e.g. redistribution policy, family policy etc. This applies in Sweden and it is assumed also to be the case in other countries.

If study assistance is a component of educational policy, it is easy to assume that the only purpose of the assistance is to contribute to the fulfilment of the goals of this policy. However, from all appearances, study assistance can also be used to meet other policy goals, this is discussed further below.

The way in which study assistance is connected to educational policy is evident in the terms of reference for the State Commission on Study Assistance. These present the most common arguments for subsidizing education.

> "Seen from society's point of view, higher education is an investment and society should, therefore, bear all the costs, not just the actual educational costs. Studying should also be seen as a job and be remunerated accordingly.
>
> - A generous study grant reduces the need to incur debts and thereby promotes a more socially even recruitment in further

education.

-Advantageous repayment rules reduce the risks for, and thereby the fear of, study debts. In addition subsidization can be directed in such a way that it goes first and foremost to those who have the greatest difficult in paying their study debts."

These arguments are not, according to the terms of reference, indisputable. The most usual counter argument given is that "studying normally leads to the individual having better prospects and a greater choice in the labour market and to a higher and more secure salary. Thus education is an investment for the individual. According to this viewpoint, it is reasonable that society's contribution is limited to supplying free education and to providing study loans with secure repayment conditions."

Thus the conception generally seems to be that the responsibility for the costs of education should be shared by both society and the individual, but that society, in addition to supplying free education, should make it financially easier for the individual to support himself during his studies. This assumption can be framed in a number of ways: in the form of a study loan on favourable terms; as a grant/scholarship; or a combination of loan and grant/scholarship.

This distribution of the responsibility for costs appears to be valid in Sweden and is assumed to apply in other countries. An exception is East Germany which, since 1982, awards every student a grant or scholarship, in other words a type of study wage.

In summary, it is asserted that the responsibility for educational policy costs are, in principle, divided between society and the individual. Society, through the state, supplies free education whilst the individual is expected to anwser for the costs of his own up keep. However, in the realization of educational policy, the state makes use of different means and instruments of which study assistance is considered to be the most important. Study assistance can, depending on the goals and

purpose of the policy being pursued, be formulated directly as loans, grants or scholarships or indirectly through subsidized accomodation, meals and travel. Further, the direct assistance in particular can be designed for different purposes which, however, need not only serve those of educational policy. It seems to be possible to identify the following goals in the established study assistance programmes.

Recruitment: the assistance should increase the intake into further education.

Social equalization: the assistance should contribute to or achieve a more even socio-economic recruitment into further education.

Generality: the assistance should be the same for all types of courses/degrees.

Autonomy: mechanisms which promote or hinder the student from being independent of his family.

Increased through put/better exam results: the assistance should be constructed so as to stimulate better exam results and to speed up the through put of students.

The goals listed above for study assistance vary in their occurance and strength between countries depending on what is intended/desired to be achieved with educational policy. Whether the effects of the different elements will be those intended is open to debate. This question necessitates that the boundaries of the comparative study are more closely defined.

Delimitation of the Subject

Study assistance is here assumed to be a social programme designed as a measure to solve what the decision maker regards as a problem or task, namely to contribute to the realization of educational policy. The social programme is transformed into reality and thus has certain direct and also, in the long term, indirect effects.

The below model illustrates the line of thought[1)]

Problem in the Real World	Perceived Problem	Study Assistance Program that is Supposed to Coincide With the Perceived Problem	Direct Effects	Indirect Effects - Outcomes

The boxes ringed in the above diagramme contain what it is considered possible to achieve within reasonable time limits and with moderate resources i.e. a comparison of how the task/problem is perceived, how the study assistance programme is designed, and what direct effects these can have in some respects. It is certainly of considerable interest to attempt to gain insights into both the direct and indirect effects (outcomes) of the provision of financial assistance to students. Questions which can be posed are, for example, whether such assistance can be used to raise the socio-cultural level, promote science and the development of knowledge or reach a higher technical-economic standard.

A comparison between countries, using these types of questions as a starting point, presupposes, amongst other things, a long term perspective with observations over time and with various contextual variables controlled. The aim of this study is less comprehensive and ambitious.

Description of the programmes

The aim of this study is, in the first place, to survey and describe the different countries' study assistance programmes and, through a comparison of the programmes' components, try to establish what is important and emphasized in each country.

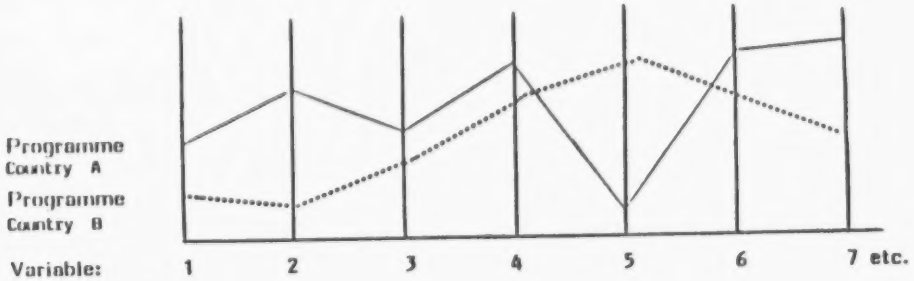
It hardly needs to be mentioned that this study is not focused on the individual but rather on the student body as a whole. This is

1) The model appears in Esping, H. Sociala program. Sekretariatet för framtidsstudier, Stockholm 1980.

seen as a matter of course as the study assistance programmes are tied to the student as a collective regardless of the consequences for the individual.

A number of goals and objectives for the study assistance programmes have been presented above. Their significance varies from country to country. Obviously different ideas prevail as to what is important in the countries' study assistance policy. This can, for example, be gathered from the extent to which the student can support himself financially, as seen in relation to a minimum wage or existence minimum, and thereby be economically independent of his parents. Thus the goals are included to varying degrees or with varying emphasis and, at the same time, constitute functions of a number of different factors. In one sense the goals can be characterized as dependent variables which are functions of one or more independent variables. Thus, for example, the goal of attaining a more even social recruitment is a function of the means testing and the degree of self-support. Whereas the goal of encouraging good exam results, like that of increasing the through put of students, is a function of financial reward (for completing studies at a normal or faster rate) and the degree of self-support.

By breaking down the dependent variables in this way into simpler and more measurable factors, it is possible to obtain a better understanding of how the goals (the dependent variables) vary in strength from country to country. The following diagramme presents a model of the comparison:



Subsidization

One of the goals for this study is to try to find relationships between the level of subsidization, expressed as different measures, and variables which are of importance from a comparative perspective. The degree of subsidization can be expressed in terms of e.g. GDP or state expenditure and the independent variables can be the cost of living for a student, socio-economic recruitment, degree of means testing etc. An examination of the relationships can provide an understanding of what it is really desired to achieve with study assistance. Many factors appear to be involved but, nevertheless, study assistance figures in each country's budget as a tangible expenditure of public money. Accordingly it is of political, social, cultural and economic interest.

It must be emphasized that the profile obtained för each country is based simply on the variables contained in the study assistance programmes. All other circumstances are ignored such as, for example, tradition, the composition of the education programme, labour market factors etc. Study assistance, as previously mentioned, is a financial help to students or can be seen as one means amongst many others of contributing to the realization of educational policy. Even in the form of a financial help to individual students, study assistance is considered to contribute to the achievement of certain societal goals.

Study assistance serves, in other words, society's purposes at the same time as it can be seen as an individual help to the students. If the subsidization inherent in free education is ignored it can be argued that the benefit to society of higher education has a price, namely the sum of all the subsidies for students regardless of their form.

In a similar way, the benefit to the individual can be said to be counterbalanced by the maintenance costs the individual himself must bear.

The benefit to society and the benefit to the individual are,

seen in this way, two aspects of educational policy which are counterbalanced by the division of the responsibility for the maintenance costs during the time the student is studying. In countries with a differentiated study assistance system, where only a certain proportion of the students receive assistance, the remaining students are expected to pay for their own up keep during their studies. This illustrates that the study assistance programmes also contain goals of an external character. Such goals could equally well be included within the framework for family or redistribution policies.

The subsidies take many different shapes in each study assistance programme. In order to determine the total amount of subsidies, it is necessary to add up all the items where some sort of subsidization direct or indirect is included. In this context the indirect assistance is ignored although it will be considered in other connections.

The direct subsidization can preliminarily be calculated through the addition of the following public expenditures.

-grants/scholarships
-interest subsidies (the difference between what should have been paid at normal bank interest rates and the rate of interest paid on the study loan)
- deferment of repayment
- writing off (remission) of study debts

The total sum of the expenditures can, if it is spread out over all students, provide a per capita measure of the extent to which the students are subsidized over a given period. This measure could, at the same time, provide a basis for an inter-country comparison of the degree of subsidization.

However, there are innumerable factors connected to the degree of subsidization which complicate its use as study object. It is not possible to obtain a true measure if subsidization is not seen in relation to maintenance costs. Naturally the cost of maintenance varies from country to country and is measured in different ways. The unit of comparison is thus the relationship between the

degree of subsidization and what is officially calculated as the cost of maintenance. Using the figures from different countries the maintenance cost is calculated as the minimum cost for a student's up keep or the minimum salary for a teaching or research assistant in further education.

One complication in this connection is that the subsidization can be calculated using different student populations, namely, either the total number in undergraduate studies, or those undergraduate students who could potentially obtain study assistance regardless of whether or not they actually received it (e.g. because of means testing etc.).

Social-Economic Recruitment Effects

As has been asserted above, there are considerable difficulties connected with identifying the effects of a study assistance programme. All effects appear to be dependent on the influence of contextual factors. These vary greatly from country to country. The task of delimiting and describing the effects is, therefore very complicated, if at all feasible. However, there is one aspect in which the direct effects seem, in reality, to be relatively easily accessible and useable in a comparison, that is with regard to the socio-economic recruitment into further education. In most countries there is interest in the levelling out effects of study assistance and, accordingly, there is data available. Therefore the study will, where possible, encompass a description of the socio-economic structure of the student body and its development.

Decision Making

According to the model or thought process presented above for the creation of a social programme, this corresponds to the decision maker's conception of the problem or task in reality, even if this conception perhaps does not match the "objective" reality. The decision maker's conceptions of the problem is determined by a number of factors in which values, ideology, institutional relationships and knowledge are regarded as playing an important role.[1] Since the study assistance programme is a direct

1) Cf. Esping, H., 1980.

consequence of the political decision and reflects the decision maker's conceptions, the factors named above are assumed to find expression in the preparatory work, propositions, and debates which have preceded the decision as well as in the programme itself.

The closer a study assistance programme complies with the ideas of different political parties and interest organizations, the greater the degree of unity is likely to be over the decision concerning the study assistance programme. The more precise and integrated the design of a study assistance programme the more likely it is that the decision makers have conciously aimed at achieving certain goals with the programme and thereby determine the direction of development.

A survey of the documents which have preceded the decision on study assistance in different countries shows that there are certain variations with regard to concensus and intention which appear, in each case, in the non-socialist countries. Variations also occur with regard to knowledge of the possible effects of the decision on the study assistance programmes, something which is evident in the extent to which preparatory studies have been carried out prior to the decision.

Accordingly, there is an interesting variation between the countries with regard to the actual decision making concerning study assistance. The assumption here is that the greater the degree of concensus characterizing the decisions, the more anticipative and goal orientated they are and the greater the degree of insight with which they were taken, the more stable the design of the study assistance.

In summary, the basic conceptions are that society and the individual share the responsibility for educational costs so that the state/society supplies free education and the individual is responsible for his own up keep during his studies. However, the state provides, on varying conditions, financial support to students in order to realize the educational policy which can

have several different sub-goals. This assistance can, therefore, assume different forms such as loans, grants/scholarships and it can be used to promote, from the social viewpoint, a more even recruitment, contribute to a faster rate of through put and better exam results in higher education and influence the student's position with regard to dependence on his/her parents.

In order to realize these aims, different techniques have been used in the design of the study assistance. One such is means testing, which, first and foremost, can be used to make it possible for students from low income families to enter higher education. Other such technical arrangements are the study assistance's maximum levels, number of months and years for which it is paid, age limit for receiving assistance, various rewards for study achievements and fast completition of studies.

The focus of this study is partly on how the study assistance is designed in different countries and the conclusions which can be drawn as to which sub-goals are given priority within the educational policy, partly on the extent to which the students are subsidized by society in relation to what they themselves must invest in their education, partly on the socio-economic recruitment to higher education and the possible effect of study assistance on this.

Further an important task is to test the extent to which there has been consensus or conflict over the decision affecting study assistance, the degree of purposefulness with which it was made and, against the background of knowledge of the study assistance programmes' effects, if it was, above all, the will of the politicians which has been decisive for the design.

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STUDY ASSISTANCE IN TEN EUROPEAN COUNTRIES:
Overview and Conceptual Framework

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